

HARRIS BEACH PLLC
ATTORNEYS AT LAW

October 5, 2020

Via ECF

Hon. Kathleen Tomlinson
United States District Court,
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722-9014

THE OMNI
333 EARLE OVINGTON BLVD., SUITE 901
UNIONDALE, NY 11553
(516) 880-8492

KEITH M. CORBETT, ESQ.
KCORBETT@HARRISBEACH.COM

Re: Joseph Jackson
-v.-
Nassau County, et. al.
United States District Court
Eastern District of New York
18 CV 3007 (JS) (GRB)

Dear Judge Tomlinson:

As you are aware, our office represents the Defendants, Incorporated Village of Freeport, the Village of Freeport Police Department and individual employees of the Village named as defendants ("Village Defendants"), in the above subject litigation. This correspondence is being submitted in compliance with the Court Order, dated September 30, 2020.

At first instance, to the extent our office incorrectly viewed this application as a motion for reconsideration of a prior order, we extend our sincerest apologies for any inconvenience this may have caused the Court. Based upon the fact, that the Plaintiff was essentially requesting the Court to reconsider the Court's prior Order, dated March 6, 2020, our office applied the fourteen day period for opposition as set forth in Local Rule 6.3. As such, it was our office's belief the submission of the opposition to the Plaintiff's application was timely. However, upon further review of the Local Rules and the Individual Practice Rules of this Court we understand that the shorter opposition period may have been appropriate in this circumstance. Once again, we sincerely apologize to the Court for any perceived error and respectfully request that the opposition be considered in the Court's determination of the instant application.

As always, I appreciate the Court's assistance with this matter. If the Court has any questions, please do not hesitate to contact the undersigned.

HARRIS BEACH PLLC
Attorneys for the Village Defendants

s/ *Keith M. Corbett*

Keith M. Corbett, Esq.
The Omni
333 Earle Ovington Blvd., Suite 901
Uniondale, New York 11553
(516) 880-8484

To: All Counsel (Via ECF)